



United States of America
FEDERAL TRADE COMMISSION
Washington, DC 20580

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March 17, 2021

VIA ECF

Hon. Louis L. Stanton, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *FTC, et al. v. Quincy Bioscience Holding Co., Inc., et al.* (17-CV-00124-LLS)
Proposed Stipulation to Extend Deadlines for Expert Discovery

Dear Judge Stanton:

Plaintiffs, the Federal Trade Commission and the People of the State of New York by Letitia James, Attorney General of the State of New York (“Plaintiffs”) and Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen Inc., Quincy Bioscience Manufacturing, LLC, and Mark Underwood (collectively, “Defendants”) (Plaintiffs and Defendants, collectively, “Parties”) hereby request that the Court enter the attached proposed stipulated order extending the deadlines for the Parties to exchange initial and rebuttal expert reports and to complete expert discovery. As set forth in the proposed stipulated order, Plaintiffs need additional time to exchange initial expert reports due to the schedules of Plaintiffs’ experts.

Respectfully,

/s/Annette Soberats
Annette Soberats, Attorney
Federal Trade Commission

cc: All parties via ECF